

**REMARKS**

**Claims 1-22** and **34-37** are pending in the application.

**Claims 1-22** and **34-37** have been rejected.

**Claims 1, 4, 12,** and **15** has been **amended**. No new matter is added herein.

**No claims** have been **cancelled** or **added** herein.

No new matter is added herein. Support for the new claims and claim amendments can be found in the originally-filed specification, e.g., at paragraphs [0018], [0020]-[0024], [0037], and [0040], among others.

*Interview Summary*

On March 8, 2012, a Telephone Interview was conducted between Examiner Fahd A. Obeid and Applicants' representative Martin R. Wojcik (Reg. No. 57,577). During this interview, Applicants' representative and Examiner Obeid discussed various limitations of the cited art. Applicants' representative would like to thank Examiner Obeid for the productive interview.

*Rejection of Claims under 35 U.S.C. § 103*

Claims 1-4, 12-15, and 33-37

Claims 1-4, 12-15, and 33-37 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Coleman, U.S. Patent No. 5,708,828 (Coleman) in view of Balgeman, U.S. Patent No. 5,446,880 (Balgeman) and further in view of King, U.S. Patent Publication No. 2003/0110104 (King). Applicants respectfully traverse this rejection.

Applicants respectfully submit that Coleman, Balgeman, and King, alone or in any rational combination, fail to teach or suggest all the elements of independent claim 1, as amended, including:

“...  
receiving target inventory balance information, wherein  
    the target inventory balance information indicates an existing inventory balance  
        information,  
    the existing inventory balance information is associated with the target  
        computerized inventory management system, and  
...  
”

creating a transaction, wherein  
the transaction is configured to update the existing inventory balance information,  
and  
the transaction is based on the inventory balance delta  
...”

Coleman relates to a data conversion system which converts data between different software and hardware platforms. *Coleman*, Abstract. Coleman, in general terms, discusses aspects related to a data conversion language/engine (DCLE), which converts data from different types of data to a data standard having a pre-defined generic data type, and then converts from this generic data type to a new desired data type and stores the result on a destination platform. *Coleman*, 2:44-54. However, insofar as Applicants are able to discern, Coleman does not teach or suggest creating a transaction, where the transaction is configured to update existing inventory balance information, and where the transaction is based on inventory balance delta. Further, the Office Action (correctly) fails to cite any passages of Coleman against any elements of claim 1 related to using an inventory balance delta, including creating a transaction that is based on such inventory balance delta. Applicants therefore respectfully submit that Coleman fails to teach or suggest at least these features of claim 1, among others.

Balgeman does not remedy the deficiencies of Coleman. Balgeman, in general terms, discusses aspects of a database interface that provides a translation from a record format of a given database to a standardized format for transmission to other nodes, thus providing translation between different databases formats. *Balgeman*, Abstract. In Balgeman, subsequent updates of a record are automatically distributed to the other nodes by utilizing a standardized record format. *Balgeman*, 8:51-60. However, insofar as Applicants are able to discern, Balgeman fails to show, teach or suggest any concept even remotely comparable to the claimed creating a transaction, where the transaction is configured to update existing inventory balance information, and where the transaction is based on inventory balance delta. Further, the Office Action (correctly) fails to cite any passages of Balgeman against any elements of claim 1 related to using an inventory balance delta, including creating a transaction that is based on such inventory balance delta.

Applicants also respectfully note that Balgeman merely discusses “transmitting a copy of an updated first record based on the original record from said second database to the first database containing the corresponding original record.” In other words, Balgeman discusses transmitting a copy of an updated record (e.g., to update another database), and is completely

silent on using a transaction, much less a transaction that is based on inventory balance delta. Applicants therefore respectfully submit that Balgeman, taken alone or in any rational combination with Coleman (which also fails to teach these features), also fails to show, teach, or suggest at least these features of claim 1, among others.

King also fails to remedy these deficiencies. King, in general terms, relates to an inventory management system associated with providing components and materials to customers. *King*, Abstract. King discusses monitoring and managing value-added services, (e.g., assembly and aggregating services that can be performed on components), and disseminating information directed to inventory management. *Id.* King also discusses sharing information related to customer demands, inventory levels, advance shipping notices, work in process, delivery, and replenishment. *Id.*

On pages 5 and 7, the Office Action cites various portions of King as allegedly relating to generating an inventory balance delta. Applicants disagree with these allegations, and respectfully submit that King also does not teach or suggest such generating, much less the claimed creating a transaction that is based on any such inventory balance delta. Instead, King is concerned with creating and fulfilling demand plans to replenish inventory based on customer demands, forecasted customer demands, and/or value added services. Applicants respectfully submit that King merely discusses performing inventory calculations based on forecasted demands from customers. In other words, at no point does King teach or even suggest generating an inventory balance delta, where the inventory balance delta is calculated as a difference between a source inventory balance and a target inventory balance.

Even in a light most favorable to the position taken in the Office Action, King simply relates to calculating a demand plan based on forecasted demands from customers. *See, e.g., King at [0043]*. However, calculating a demand plan is not the same as generating an inventory balance delta, at least for the simple reason that such a demand plan does not reflect any sort of relationship between any source inventory balance and any target inventory balance (even assuming, for the sake of argument, that such analogous elements were to exist in King). Furthermore, there is also no element in King that can be equated to a transaction that is based on any such inventory balance delta. Thus, King, taken alone or in any rational combination with Balgeman and Coleman (which also fail to teach these features, as noted earlier), also fails to show, teach, or suggest at least these features of claim 1, among others.

## PATENT

In summary, since the combination of Coleman, Balgeman, and King does not teach or suggest each and every feature of claim 1, the combination of Coleman, Balgeman, and King cannot render claim 1 obvious. Furthermore, independent claim 12 is patentable over Coleman, Balgeman, and King for similar reasons to independent claim 1, and further in view of its own features. Claims 3-4 and 34-37, which depends from independent claim 1, and claims 13-15, which depend from independent claim 12, are patentable over Coleman, Balgeman, and King for at least the reasons provided for their respective base independent claims, and further in view of their own features. Accordingly, Applicants respectfully request that the rejection of claims 1-4, 12-15, and 34-37 under 35 U.S.C. § 103(a) be reconsidered and withdrawn.

### Claims 5-11 and 16-22

Claims 5-11 and 16-22 are rejected under U.S.C. § 103(a) as being unpatentable over Coleman in view of Balgeman, King, and further in view of Katz, U.S. Patent Publication No. 2002-0178077 (Katz). Applicants respectfully traverse this rejection.

As described above, independent claims 1 and 12 are patentable over Coleman, Balgeman, and King. Upon review of Katz, Applicants can discern no showing, teaching, or even suggestion that Katz in any way remedies the deficiencies of Coleman, Balgeman, and King, and therefore claims 1 and 12 are also patentable over Coleman, Balgeman, King, and Katz, alone or in combination. Applicants further assert that claims 5-11, which depend from claim 1, and claims 16-22, which depend from claim 12, are also patentable over Coleman, Balgeman, King, and Katz for at least the reasons provided for their respective base claims, and further in view of their own features. Accordingly, Applicants respectfully request that the rejection of claims 5-11 and 16-22 be reconsidered and withdrawn.

**CONCLUSION**

Applicants submit that all claims are now in condition for allowance, and an early notice to that effect is earnestly solicited. Nonetheless, should any issues remain that might be subject to resolution through a telephonic interview, the Examiner is requested to telephone the undersigned.

If any extensions of time under 37 C.F.R. § 1.136(a) are required in order for this submission to be considered timely, Applicants hereby petition for such extensions. Applicants also hereby authorize that any fees due for such extensions or any other fee associated with this submission, as specified in 37 C.F.R. § 1.16 or § 1.17, be charged to deposit account 502306.

Respectfully submitted,

/ Samuel G. Campbell III /

Samuel G. Campbell III  
Attorney for Applicants  
Reg. No. 42,381  
Telephone: (512) 439-5084  
Facsimile: (512) 439-5099